

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM  
POWER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

**CERTIFICATION OF KRISTEN R. FOURNIER IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO PLAINTIFFS' STEERING  
COMMITTEE'S MOTION FOR THE ENTRY OF AN ORDER TO  
ESTABLISH A CENSUS**

I, Kristen Renee Fournier, declare as follows:

I am an attorney and a partner with the law firm King & Spalding LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Certification in Support of Defendants' Opposition to Plaintiffs' Steering Committee's Motion for the Entry of an Order to Establish a Census.

1. Attached hereto as **Exhibit 1** is a true and correct copy of a letter dated February 15, 2024 from Sean Domnick to the Committee on Rules of Practice and Procedure, entitled "Proposed Amendments to Rule 16.1 (Multidistrict Litigation)."

2. Attached hereto as **Exhibit 2** is a true and correct copy of a Complaint filed on June 29, 2016 in *Musgrove v. Johnson & Johnson, et al.*, E.D. Ill., Case No. 1:16-cv-06847 (Dkt. No. 1).

3. Attached hereto as **Exhibit 3** is a true and correct copy of a Complaint filed on July 8, 2016 in *Gould v. Johnson & Johnson, et al.*, N.D. Cal., Case No. 4:16-cv-03838 (Dkt. No. 1).

4. Attached hereto as **Exhibit 4** is a true and correct copy of a chart entitled “PSC Claims By Disease.”

5. Attached hereto as **Exhibit 5** is a true and correct copy of a Plaintiff Profile Form submitted by Edith Small in this MDL.

6. Attached hereto as **Exhibit 6** is a true and correct copy of a Plaintiff Profile Form submitted by Patricia Zirpolo in this MDL.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 19, 2024

/s/ Kristen Renee Fournier  
Kristen Renee Fournier